

PBO
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September 25, 2012

Marianne Lewis, Registration Division
Office of Pesticide Programs,
Environmental Protection Agency
1200 Pennsylvania Ave. NW.,
Washington, DC 20460-0001
Filed online at www.regulations.gov

Attn: Docket No. EPA-HQ-OPP-2012-0334 Comment

Re: Emergency Petition for Suspension of Registration - Clothianidin dated March 20, 2012

Dear Ms. Lewis,

This additional comment is submitted on behalf of the Center for Food Safety which was the lead author of the above-referenced Petition. Please see the attached 60-page compilation, "Literature on Effects of Neonicotinoid Insecticides". It provides comprehensive, although not completely exhaustive, references under the subheadings below (due to the length of this compilation effort it may not incorporate very recent studies):

- Acute Toxicity
- Residual Toxicity
- Sublethal Toxicity
- Chronic Toxicity
- Immune Suppression and Synergistic Effects
- Studies on Metabolites
- Residues
- Guttation Fluid Studies
- Toxicity of Contaminated Dust
- Incident Studies
- Reviews of Registrant Studies
- Summary Reviews of Literature Articles
- Risk Assessment Process and Tests for Bees
- Articles Claiming No Effects from Neonicotinoids at Environmentally Relevant Concentrations
- Related Studies for Neonicotinoids and Bees
- Environmental Fate and Ecotoxicity Studies
- Ecotoxicity Studies for Other Non-target Organisms

The Center for Food Safety submits this compilation as it provides a preponderance of evidence showing unreasonable adverse effects of clothianidin and other neonicotinoid insecticides. It

provides further basis in addition to the Petition itself, our supplemental filings in the docket and our other comments that EPA should grant the Petition in full.

Please contact me if you have any questions.

Sincerely,

/s/

Larissa Walker, Project Organizer
Center for Food Safety
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Washington, DC 20003
Tel: (202) 547-9359; email: lwalker@centerforfoodsafety.org

Attachment

Attachment

Literature on Effects of Neonicotinoids

Acute Toxicity

Bailey, J., C. Scott-Dupree, R. Harris, J. Tolman, and B. Harris. 2005. Contact and oral toxicity to honey bees (*Apis mellifera*) of agents registered for use for sweet corn insect control in Ontario, Canada. *Apidologie* 36(4): 623-633.

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Immune Suppression and Synergistic Effects

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